

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

NOTICE OF MARKET DOMINANT
PRICE ADJUSTMENT

Docket No. R2013-10

COMMENTS OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO

The American Postal Workers Union, AFL-CIO (APWU) hereby objects to the methodology used by the Postal Service in calculating workshare discounts in this price adjustment. The Postal Service provides limited explanation or justification for its change in calculating the size of the discount that is to be compared with the avoided cost number. In the past, that discount has always been compared with the single piece letter rate. The Postal Service has now split the single piece letter rate into a stamped letter rate and a metered letter rate and is calculating the discounts from the lower rate. The effect of this change is to adversely affect rates and services provided to users of postal services who do not take advantage of the discount rates. These discounts are, therefore, in violation of Sections 3622(e)(2) and 3622(e)(4)(C) of the Act.

Darryl J. Anderson, Esq.
Counsel for American Postal Workers Union, AFL-CIO
O'Donnell, Schwartz & Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Voice: (202) 898-1707
DAnderson@odsalaw.com

October 18, 2013